

September 14, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, Rural Broadband Network Services LLC (RBNS), provides fixed wireless broadband service in the Shenandoah Valley of Virginia. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no [or few] broadband choices. We built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, many consumers in the Shenandoah Valley region can now get broadband service.

RBNS is very interested in utilizing television white spaces so that we can expand and improve service. We are located in a very wooded and hilly and the current unlicensed spectrum although a very powerful tool reaches only about 50% of the consumers in our area. This is primarily due trees blocking line of site. Non-line of sight technologies such as 900mhz to not have the same performance and are only an option to a point. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying and not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also

would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

Our company is poised and ready to take advantage of this new spectrum to provide real broadband services over a fixed wireless network. This will create job opportunities in our area and give many who wish to move into the rural areas an incentive to purchase and build housing irregardless of wire-line broadband services.

Sincerely,

Alex Phillips
CEO
Rural Broadband Network Services LLC
HighSpeedLink.net